REMARKS

In the first Office Action after filing a request for continued examination under 37 CFR 1.114, claim 21 was rejected under 35 U.S.C. 102(b) as being anticipated by JP 08-027439 (Takemura). The Examiner maintained his previous position that Takemura's substrate contains corrosion inhibiting additives, reasoning that "the substrate is herein understood to be penetrated by the tacky agent layers." The Examiner further asserted that applicants' previous argument that the middle layer of their claimed laminate is non-permeable "is not commensurate in scope with the claims." However, applicants wish to point out that claim 21 was previously amended to recite that the middle polymeric layer of their laminate is **non-permeable**. See the "Amendment Accompanying RCE" filed on December 19, 2005. See also Fig. 2, and the specification at page 5, lines 12-13. The Examiner must have overlooked the claim language in applying Takemura. Takemura's tape structure does not anticipate the claimed multi-layer laminate as Takemura does not teach or suggest a multi-layer laminate which comprises **two** or more polymers with a **non-permeable polymeric film** layer **therebetween** as explicitly recited in claim 21. Rather, Takemura teaches a tape comprising a **single** layer of a polyester base material with a rust-preventing agent coated on the outer surfaces of the tape.

Takemura clearly does not teach or suggest the claimed construction, and therefore could not be expected to provide protection against corrosion and abrasion as claimed. Nor is there any expectation of success as Takemura teach an anticorrosive tape for use on piping, not a tape for use on printing blankets/cylinders. Claim 21 is clearly patentable over Takemura.

Claims 2, 4-9, 21 and 22 are rejected under 35 U.S.C. 103(a) as being unpatentable over Bresson et al. (US 5,352,507) in view of Linska (US 4,766,811) and WO 93/01003 (Pinkston; newly cited). The Examiner maintains that it would have been obvious to use the adhesive coated foil of Linska in place of the adhesive layer taught by Bresson to provide corrosion resistance, and further asserts that it would have been obvious to use an elastomeric binder comprising sacrificial metal particles as taught in Pinkston in place of the foil taught by Linska.

Applicants first wish to reiterate that it is the Examiner's burden when attempting to combine reference teachings to establish some suggestion, teaching, or motivation to combine the art in the manner proposed. *Pro-Mold & Tool Co. v. Great Lakes Plastics, Inc.*, 75 F.2d 1568, 1572 (Fed.Cir. 1996). However, there is no motivation to use the adhesive foil of Linska in Bresson. Linska does not teach or suggest applying a metal foil to a printing blanket construction as claimed, but rather applies his foil (2) to a cover plate (1) on a printing cylinder. Nowhere does Linska teach or suggest applying a metal foil to a printing blanket comprising a printable surface layer and a metal base ply as claimed.

With regard to claim 21, Linska does not teach or suggest a multi-layer laminate comprising two or more polymers with a polymer film therebetween which contains corrosion-inhibiting additives as claimed.

With regard to claim 22, applicants previously pointed out that Linska teaches a very thin film layer, while applicants require a film having a thickness of at least 0.0013 cm. The Examiner has now applied the newly cited Pinkston reference, which, in one embodiment, teaches an elastomeric coating containing sacrificial metal particles on the opposite surface of a printing blanket base ply. The Examiner asserts that it would have been obvious to substitute the adhesive foil of Linska with the coating of Pinkston, pointing out that Pinkston teaches metal particles having a diameter of from between 1-50 microns and reasoning that such a coating would meet the claimed thickness of applicants' polymeric protective film.

However, again the Examiner has provided no motivation for making the proposed substitution. Pinkston is not directed to a protective film which is used to reduce corrosion and abrasion of a printing blanket having a **metal** base ply. Rather, Pinkston is only concerned with reducing corrosion of a blanket cylinder, not the blanket. Nor does Pinkston teach or suggest a blanket construction having a **metal** base ply as claimed. Rather, Pinkston teaches a blanket construction comprising a fabric or elastomer base ply provided with a metal layer or a coating of metal to provide sacrificial anode protection to the blanket cylinder during printing. That is, one embodiment of the Pinkston construction creates preferential corrosion of the blanket in order to protect the underlying cylinder. Further, in the embodiment of Pinkston in which the elastomer coating containing metal particles is applied to the base ply, the coating is clearly impregnated into the (fabric) base ply (see Fig. 4). In addition, the base ply containing the coating is ground after coating to expose the metal particles in the coating. Accordingly, Pinkston's coating would not meet applicants' claimed polymeric layer thickness, nor would there be any motivation to modify Pinkston as he does not achieve corrosion protection of the blanket base ply with the use of a protective polymeric film.

The Examiner has relied on hindsight reconstruction in an attempt to meet applicants' claims. The Examiner continues to ignore the fact that Bresson neither recognizes nor offers a solution to the problem of corrosion of metal-backed printing blankets and printing cylinders. There is simply no motivation to substitute Bresson's adhesive layer with the adhesive foil of Linska or the sacrificial metal coating of Pinkston. Even if one were to make the proposed substitutions, the claimed construction would not result. None of the references, taken together or separately, teach or suggest a printable surface layer on the first surface of a **metal** base ply and a **protective polymer having a thickness of at least 0.0013 cm** adhered to the second surface of the base ply with an adhesive for the purpose of reducing corrosion and abrasion of the printing blanket as well as a blanket cylinder.

For all of the above reasons, applicants submit that claims 2, 4-9, and 21-22 are patentable over the cited prior art and are in condition for allowance. Early notification of allowable subject matter is respectfully requested.

Respectfully submitted,

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